

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re NATIONAL PRESCRIPTION OPIATE) No. 1:17-md-2804
LITIGATION)

) Judge Dan A. Polster

This Document Relates To:)
)
ALL CASES.)

)

DECLARATION OF EVAN M. JANUSH IN SUPPORT OF
PLAINTIFFS' REPLY IN SUPPORT OF THE MOTION FOR SANCTIONS
AGAINST THE ALLERGAN AND TEVA DEFENDANTS

I, Evan M. Janush, declare as follows:

1. I am Managing Attorney of the Pharmaceutical Practice of the Lanier Law Firm, which is a member of the Plaintiffs' Executive Committee ("PEC") in the National Prescription Opiate Litigation, MDL 2804. I submit this declaration in support of Plaintiffs' Reply in Support of the Motion for Sanctions Against the Allergan and Teva Defendants.

2. Attached hereto are true and correct copies of the following exhibits.

Exhibit 1: Transcript of Conference Before Special Master David R. Cohen, dated April 24, 2019;

Exhibit 2: Discovery Telephonic Conference, dated April 30, 2019;

Exhibit 3: E-mail string from Mark Crawford to Rebecca Hillyer and Wendy West Feinstein, dated June 25, 2018;

Exhibit 4: Relevant excerpts from Actavis plc Form 10-K for the fiscal year ended December 31, 2014;

Exhibit 5: Relevant excerpts from the transcript of the videotaped deposition of Thomas P. Napoli, taken January 17, 2019;

Exhibit 6: Letter from Donna M. Welch, P.C. to Thomas E. Egler, dated August 8, 2018;

Exhibit 7: Letter from Donna M. Welch, P.C. to Aelish M. Baig, dated March 11, 2019; and

Exhibit 8: Relevant excerpts from the transcript of the 30(b)(6) videotaped deposition of Mary Woods, dated January 9, 2019.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 21, 2020, at New York, New York.



EVAN M. JANUSH

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of September, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF System.

s/ Peter H. Weinberger
PETER H. WEINBERGER
Plaintiffs' Liaison Counsel
